

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN, AND  
IRBESARTAN PRODUCTS LIABILITY  
LITIGATION**

**This Document Relates to All Actions**

MDL No. 2875

Honorable Robert B. Kugler,  
District Court Judge

Honorable Karen M. Williams,  
Magistrate Judge

Honorable Thomas Vanaskie  
(Ret.), Special Discovery Master

**[PROPOSED] ORDER  
GRANTING PARTIAL  
MOTION TO STRIKE**

**THIS MATTER** having come before the Court upon the ZHP Parties' Motion to Partially Strike Reply Brief in Support of Plaintiffs' Motion to Compel Production of Documents Withheld as Chinese State Secrets, or For Leave to File a Sur-Reply, on notice to liaison counsel for Plaintiffs, and the Court having considered the parties' submissions; and for good cause shown:

It is, on this \_\_\_\_\_ day of \_\_\_\_\_ 2021,

**ORDERED AND ADJUDGED** that that the ZHP Parties' Motion to Partially Strike Plaintiffs' Reply Brief is **GRANTED IN FULL** and the Clerk of Court is directed to strike Plaintiffs' arguments related to the *Aerospatiale* and *Richmark* factors from the reply brief.

IN THE ALTERNATIVE, it is, on this \_\_\_\_\_ day of  
\_\_\_\_\_ 2021, **ORDERED AND ADJUDGED** that this Court  
grants the ZHP Parties leave to file a sur-reply brief to respond to Plaintiffs' newly  
raised arguments in its Motion to Compel Production of Documents Withheld as  
Chinese State Secrets and deem the accompanying brief the ZHP Parties' sur-reply.

\_\_\_\_\_  
Honorable Thomas I. Vanaskie,  
Special Master